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**U.S. Department of Justice** 

United States Attorney Eastern District of New York

LDM:BGK:NEP F.# 2019V02754

271 Cadman Plaza East Brooklyn, New York 11201

February 2, 2021

#### By ECF

United States Magistrate Judge Roanne L. Mann United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. The Real Property and Premises Known as

Deed No. 18,877 et al. - Docket No. 19-CV-05748 (ENV)(RLM)

#### Dear Judge Mann:

Pursuant to the Court's November 9, 2020 Order, the United States respectfully submits this status report regarding the above-captioned matter.

### I. Background

As set forth in the government's status report dated, November 5, 2020, a forfeiture complaint was filed against real property located in Mexico (the "Defendant Properties") that were purchased with the proceeds from the sale of illegal narcotics by Rafael Caro Quintero, the principal leader of the Caro Quintero Drug Trafficking Organization in Mexico. On or about October 23, 2019, the United States formally requested assistance from Mexico in the forfeiture of the Defendant Properties pursuant to the Mutual Legal Assistance Treaty ("MLAT") between our countries. The MLAT request asked Mexico, in part, to restrain the Defendant Properties and to give timely notice of the forfeiture proceeding to any person who reasonably appeared to have an interest or claim to the Defendant Properties. The authorities in Mexico were asked to post on the Defendant Properties copies of the Verified Complaint and notice of the action, as required by 18 U.S.C. § 985.

On or about November 25, 2020, pursuant to the MLAT request, prosecutors of the Fiscalia General de la Republica ("FGR") of Mexico, placed notice of the United States forfeiture action on six of the eight real properties in and around Guadalajara, Mexico. In addition, it is our understanding that the FGR also summoned the owners of the noticed

properties to a meeting relating to their own investigation of the use of illegal narcotics in the purchase of said properties. We have been informed that authorities in Mexico will be sending conformation of these events in response to our MLAT request. Thereafter, the United States will be in a position to move for a default on the noticed properties.

## II. Conclusion

Based upon the status provided above, the United States, if amenable to Your Honor, will provide within 90 days, a further update to the Court with respect to this matter.

Respectfully submitted,

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